

REMARKS

In response to the Office Action dated July 16, 2003, Applicant respectfully requests reconsideration based on the above claim amendment and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Claims 1-23 were pending in the application. Claims 1, 5, 7-8, 10-16 and 21-23 have been amended. A substitute specification, in both clean and marked-up version pursuant to 27 C.F.R. §1.125 is submitted. No new matter has been added in the application by the amendments.

Specification objections

The disclosure was objected to because of informalities: the item "Carrier" is a generic terminology and should be used as such.

Applicant respectfully submits a substitute specification, in both clean and marked-up version pursuant to 27 C.F.R. §1.125. In the substitute specification, the item "Carrier" has been amended to be used as a generic terminology. Further, a term "reconciliation tool" has been amended to "reconciliation device" to maintain the consistency in the specification and Figures. No new matter is added into the substitute specification. Please insert the substitute specification and use the same for prosecution purposes.

Thus, withdrawal of the specification objection is respectfully requested.

Claims objections

Claims 1, 5, 7, 10-16 and 21-23 were objected to because of informalities: the terms "Carrier(s)" "Billed data" "Unbilled data" and "Error data" cited in these claims are generic terms therefore should not be capitalized.

Claims 1, 5, 7, 10-16 and 21-23 have been amended to change the capitalized terms.

Thus, withdrawal of the claim objections is respectfully requested.

Claim Rejections Under 35 U.S.C. § 112

Claims 1-23 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Particularly, the Examiner states that, in claims 1 and 16, the recitations "the

total amount of accounts receivable”, “the total amount of pre-processed accounts receivable” and “the total amount of processed accounts receivable” lack proper antecedent basis.

The recitation “the total amount of accounts receivable”, in lines 8 and 9 of previously presented claims 1 and 16, has been amended to recite “a total amount of accounts receivable”, wherein “a total amount of accounts receivable” indicates a total value of the accounts receivable located in each tracking set. The recitation “the total amount of pre-processed”, in lines 10 and 11 of previously presented claims 1 and 16, has been amended to recite “a total amount of pre-processed accounts receivable”, wherein “a total amount of pre-processed accounts receivable” indicates a total value of the accounts receivable inputted to a processing entity by a carrier. The recitation “the total amount of processed accounts receivable” in lines 11 and 12 of previously presented claims 1 and 16 has a proper antecedent bases by the currently amendment of claims 1 and 16. In lines 10 and 11 of currently amended claims 1 and 16, “a total amount of processed accounts receivable” indicates a sum of the computed total amounts of accounts receivable of the at least two tracking sets.

Thus, claims 1 and 16 are believed to satisfy the antecedent basis of section 112, second paragraph. Claims 2-15 depend from claim 1 and claims 17-23 depend from claim 16. These claims are believed to be allowable due to their dependencies on claims 1 and 16.

Thus, withdrawal of the claim rejections is respectfully requested.

Claim Rejections under 35 U.S.C. 103:

Claims 1-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over Crooks et al., US 5,943,656 (hereinafter “Crooks”) for the reasons stated on pages 3-5 of the Office Action.

Claim 1 has been amended to recite a method of automatically tracking and balancing account receivable data comprising: submitting a billing data file to a processing entity, said billing data file comprising customer account records representing accounts receivable for a given carrier; determining each of said customer account records as one of at least two tracking data sets based on pre-defined criteria; computing

a total amount of accounts receivable for said customer accounts records located in each tracking data set related to said given carrier; generating a total amount of processed accounts receivable related to said given carrier by adding the computed total amounts of accounts receivable of the at least two tracking data sets; comparing a total amount of pre-processed accounts receivable related to said given carrier to the total amount of processed accounts receivable related to said carrier, the total amount of pre-processed accounts being the total amount of the accounts receivable inputted to the processing entity by said carrier; creating a discrepancy report comprising said carrier if the total amount of pre-processed accounts receivable do not equal the total amount of processed accounts receivables; and creating a settlement report for said carrier if the total amount of pre-processed accounts receivable submitted equals the total amount of processed accounts receivable. Support for the amendment can be found in the entire specification, for example, paragraphs [0047]-[0049] of the specification.

The method of claim 1 automatically and easily tracks and balances the accounts receivable related to a carrier by providing a discrepancy report or a settlement report. On the contrary, Crooks provides a consolidated amount for any one customer of all of the amounts owned to a utility provider(s) (col. 9, lines 44-46). Thus, Crooks teaches away from the invention of claim 1.

More particularly, Crooks does not teach or suggest the total amount of processed accounts receivable for the carrier and the total amount of pre-processed accounts receivable for the carrier, as recited in claim 1. In claim 1, the total amount of processed accounts receivable is generated by respectively computing the total amount of accounts receivable for customer account records located in one tracking set, and by adding the computed total amounts of accounts receivable for all of the tracking sets. On the contrary, the actual bill is generated, in Crooks, when a consolidated amount (which is an individual respective amount a billable entity is to pay to a billing entity) is provided to the billable entity and the billable entity authorizes the payment (col. 6, lines 9-18). Thus, the actual bill does not mean anything more than the amount the billable entity authorizes. Accordingly, the actual bill is not the total amount of processed accounts receivable for the carrier.

Further, the estimation, in Crooks, is an alternative consolidated amount based on historical billing information of each billable entity. Thus, the estimation is the consolidated bill, which closely approximates the actual bill (col. 6, lines 63-67), instead of the total amounts of the billable entities inputted to a host system by the billing entity. Thus, the estimation is not the total amount of pre-processed accounts receivable for the carrier.

Furthermore, Crooks does not teach generating the discrepancy report and settlement report. The audit process, in Crooks, is performed by checking the billing information received from the billing entity against one or more pre-defined tolerance parameters. The pre-defined tolerance parameter is neither the total amount of processed accounts receivable of the at least two tracking sets nor the total amount of pre-processed accounts receivable. Further, the audit process is performed prior to processing the billing information to provide the consolidated amount to each billable entity (col. 6, lines 40-41). This is different from claim 1 in which the accounts receivable are processed prior to comparing the total amount of processed accounts receivable with the total amount of pre-processed accounts.

Accordingly, Crooks neither teaches nor suggests the elements: generating a total amount of processed accounts receivable related to said given carrier by adding the computed total amounts of accounts receivable of the at least two tracking data sets; comparing a total amount of pre-processed accounts receivable related to said given carrier to the total amount of processed accounts receivable related to said carrier, the total amount of pre-processed accounts being the total amount of the accounts receivable inputted to the processing entity by said carrier; creating a discrepancy report comprising said carrier if the total amount of pre-processed accounts receivable do not equal the total amount of processed accounts receivables; and creating a settlement report for said carrier if the total amount of pre-processed accounts receivable submitted equals the total amount of processed accounts receivable, as claimed in claim 1.

Claim 16 has been amended to recite a system for automatically tracking and balancing account receivable data comprising: a carrier submitting a billing data file to a processing entity, said billing data file comprising customer account records representing

accounts receivable for said carrier; and the processing entity, determining each of said customer account records as one of at least two tracking data sets based on pre-defined criteria; computing a total amount of accounts receivable for said customer account records located in each tracking data set related to said carrier; generating a total amount of processed accounts receivable related to said carrier by adding the computed total amounts of accounts receivable of the at least two tracking data sets; comparing a total amount of pre-processed accounts receivable related to said carrier to the total amount of processed accounts receivable related to said carrier, the total amount of pre-processed accounts receivable being the total amount of the accounts receivable inputted to the processing entity by said carrier; creating a discrepancy report comprising said carrier if the total amount of pre-processed accounts receivable do not equal the total amount of processed accounts receivables; and creating a settlement report for said carrier if the total amount of pre-processed accounts receivable submitted equals the total amount of processed accounts receivable.

Claim 16 is believed to be allowable for at least the reasons given for claim 1. Claims 2-15 depend from claim 1 and claims 17-23 are believed to be allowable due to their dependencies on claims 1 and 16, which are believed to be allowable.

Thus, withdrawal of the claim rejections under 35 U.S.C. § 103(a) is respectfully requested.

Conclusion

In view of the foregoing remarks and amendments, Applicant submits that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130 maintained by Applicant's attorneys.

Respectfully submitted,

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